

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

*Prince George's County, Maryland,*

Plaintiff,

v.

*Eli Lilly and Company, Sanofi-Aventis U.S. LLC, Novo Nordisk Inc., CVS Health Corporation, CVS Pharmacy, Inc., Caremark Rx, LLC, Caremark, LLC, CaremarkPCS Health, LLC, Evernorth Health, Inc., Express Scripts, Inc., Express Scripts Administrators, LLC, Medco Health Solutions, Inc., ESI Mail Pharmacy Service, Inc., Express Scripts Pharmacy, Inc., UnitedHealth Group Incorporated, Optum, Inc., OptumRx, Inc., and Optum Insight, Inc.,*

Defendants.

Civil Case No. 8:25-cv-00137-TDC

**MOTION FOR LEAVE TO FILE  
COMPLAINT**

COMES NOW the Plaintiff, Prince George's County, Maryland, by and through their attorneys, Philip C. Federico, Brent P. Ceryes, Matthew P. Legg, Stella D. Pratt and Brockstedt Mandalas Federico LLC, and pursuant to Maryland Local R. 103.1(d), respectfully submit this Motion for Leave to File Complaint in this Court and hereby states:

1. On August 4, 2023, the United States Judicial Panel on Multidistrict Litigation transferred 5 civil actions to the United States District Court for the District of New Jersey for coordinated or consolidated pretrial proceedings pursuant to 28 U.S.C. § 1407. Since that time, over 200 additional actions have been transferred to the District of New Jersey, case name: *In Re: Insulin Pricing Litigation*, C.A. No.: 2:23-md-03080-BRM-RLS. All such actions have been assigned to the Honorables Brian R. Martinotti and Rukhsanah L. Singh.

1           2.       The foregoing matter involves questions of fact that are common to the actions  
2 previously transferred to the U.S. District Court for the District of New Jersey and assigned to  
3 Judge Martinotti and Judge Singh.

4           3.       As such, the parties expect this matter to be transferred as a tag along action,  
5 pursuant to Rule 7.1 of the Rules of Procedure of the United States Judicial Panel on Multidistrict  
6 Litigation and expected to be transferred under 28 U.S.C. § 1407 to the District of New Jersey, with  
7 the consent of this Court.

8           4.       As a practical matter, and in order to sufficiently and properly plead the required  
9 allegations of this Complaint, it is necessary for Plaintiff to exceed this Court's forty (40) page  
10 limitation specified in Md. Local Rule 103.1(d). Similar complaints that are currently pending as  
11 part of this Multidistrict Litigation in the U.S. District Court for the District of New Jersey  
12 demonstrate this necessity. *See, e.g.*, Exhibit 1.

13           WHEREFORE, the Plaintiff respectfully requests leave of this Court to file the full  
14 Complaint, which is two hundred and forty-one (241) pages in length and fifty-four (54) additional  
15 pages of exhibits. *See* Exhibit 2.

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18  
19 Dated: January 24, 2025

Respectfully submitted,

20  
21 /s/ Matthew P. Legg

**BROCKSTEDT MANDALAS FEDERICO  
LLC**

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Brent P. Ceryes, Bar No. 19192

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